IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

NATIONAL UNION FIRE INSURANCE	§	
COMPANY OF PITTSBURGH, PA.,	§	
	§	
Plaintiff,	8	
30 /	8	
V.	§	Civil Action No. 3:19-CV-01364-K
	8	
BACARELLA TRANSPORTATION	§	
SERVICES, INC., SPRINT	§	
CORPORATION, BRIGHTSTAR	§	
INTERNATIONAL CORP. D/B/A	§	
BRIGHTSTAR CORP., T.S. EXPRESS,	§	
INC., FORWARD AIR CORPORATION,	8	
NORMARK OF TEXAS, LLC, AND	§	
OSCAR MACEDO CAMPUZANO	8	
	§	
Defendants.	§	
U Company of the Comp	v	

DEFENDANT BRIGHTSTAR INTERNATIONAL CORP.'S MOTION TO DISMISS

Pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(2), 12(b)(5), and 12(b)(6), Defendant Brightstar International Corp. ("Brightstar") respectfully moves to dismiss all claims filed against it by Plaintiff National Union Fire Insurance Company of Pittsburgh, PA ("National Union"). As set forth in detail in the Brief in Support of Motion to Dismiss filed contemporaneously herewith, National Union fails to assert sufficient facts to: (1) establish its standing to sue Brightstar; (2) establish personal jurisdiction over Brightstar in this Court; (3) demonstrate proper service of process; and (4) state a plausible claim for relief against Brightstar.

WHEREFORE, Brightstar respectfully requests that the Court enter an Order dismissing National Union's claims against Brightstar, and for such other and further relief as the Court deems just and proper.

Dated: July 26, 2019 Respectfully submitted,

BARNES & THORNBURG LLP

By: /s/Lucas C. Wohlford

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CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2019, a true and correct copy of the above and foregoing was electronically filed and served on all counsel of record via the Court's CM/ECF system.

/s/ Lucas C. Wohlford
Lucas C. Wohlford